UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

Parents, Families, and Friends of Lesbians)	
and Gays, Inc., et al.,)	
Plaintiffs,)	
)	
v.)	No. 2:11-cv-04212-NKI
)	
Camdenton R-III School District; et al.,)	
)	
Defendants.)	

MOTION FOR LEAVE TO PROCEED UNDER PSEUDONYM

Comes now Plaintiff Jane Doe, by her next friend John Doe, and moves this Court for entry of an order granting them leave to proceed under pseudonyms. In support of this motion, Plaintiff states:

- 1. Plaintiff Jane Doe, a minor who attends Camdenton High School, seeks leave to, along with her next friend, proceed under a pseudonym to protect her privacy and to avoid retaliation.
- 2. In this case, Plaintiff Jane Doe challenges her school district's viewpoint discrimination in its selection of information available in its library by operation of an Internet filter.
- 3. Use of a pseudonym is appropriate because: (a) Plaintiff is challenging a government action; (b) no Defendant would be prejudiced in defending against this suit; (c) Plaintiff is a minor; (d) there is a serious risk that Plaintiff would suffer injury if publicly identified; and (e) there is no other means of protecting

Plaintiff's legitimate interests. Identification of Plaintiff Jane Doe's father and next friend would effectively identify her.

4. In further support of this Motion, Plaintiffs rely upon their Suggestions in Support of Motion to Proceed Under Pseudonym.

WHEREFORE Plaintiff Jane Doe moves this Court for entry of an order granting her and her next friend leave to proceed under pseudonyms in this action and allowing such other or further relief as is appropriate under the circumstances.

Respectfully Submitted,

By /s/ Anthony E. Rothert

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CERTIFICATE OF SERVICE

I hereby certify that on August 30, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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Attorneys for Defendants Camdenton R-III School District and Timothy E. Hadfield

/s/ Anthony E. Rothert